

I am a cable television basic service tier subscriber who does not have a set top box or CableCARD capable equipment. My television set has a QAM tuner.

First, here are some suggestions.

Consider leaving to basic service rate regulators the conditions under which equipment necessary to view basic service tier signals is provided without charge. In areas where basic service is not rate regulated due to the presence of competition, competition among cable operators would determine what equipment is provided at what price.

Consider explicitly including in a regulation about cable operators providing equipment that is needed to view basic service tier signals, whether that equipment can process High Definition (HD) signals. According to footnote 58 on page 10 of the Notice of Proposed Rulemaking: "The boxes that Cablevision offered to its subscribers are capable of outputting a high-definition picture."

Consider changing the proposed 76.630(a)(1)(iv) so that instead of applying to only subscribers who receive Medicaid, it applies to subscribers who are eligible for low-income telephone service. It is likely a good idea to have a uniform low-income eligibility standard for all services regulated by the federal government.

Second, here are some opinions.

I find claims about benefits from a reduction in truck rolls unconvincing. Truck rolls to connect and disconnect service will be replaced by vehicle rolls to deliver and return the additional equipment needed to view basic service tier signals. With the proposed changes, a new subscriber at a previously connected location will wait for equipment to be delivered rather than for the cable to be reconnected.

Concerning the theft of cable television service because a cable operator has not used adequate connection and disconnection procedures, for example, when installing internet service without television service, the burden to correct the situation should be on the cable operator, not on basic service tier subscribers.

As far as I can tell, encrypting basic service tier signals will have no direct benefits for a basic service tier subscriber, like me. However, it will have a direct cost. Basic service subscribers will pay for additional equipment they do not currently need, after an initial period during which the equipment is provided at no charge.

Based on a recent "Services & Pricing" guide from my cable operator, the additional equipment needed to decrypt basic service signals will increase my monthly cable bill 10% for each television set.